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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 CARLA PETERSON,
A.K.A. REGINA ANN KING.
15 Defendant.
16

Case No. 2:19-cr-119-APG-GWF

EMERGENCY STIPULATION TO
MODIFY A CONDITION OF
PRETRIAL RELEASE
(Expedited Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich,
18 United States Attorney, and Kimberly Frayn, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Monique Kirtley,
20 Assistant Federal Public Defender, counsel for Carla Peterson, to modify a condition of pre-trial
21 release.
22

23 This Stipulation is entered into for the following reasons:

24 1. On June 19, 2019, Ms. Peterson was notified that her father, who resides in
25 Myrtle Beach, South Carolina, was admitted into the hospital. Ms. Peterson's father was admitted
26 into the hospital due to having fluid around his lungs and pacemaker. Ms. Peterson seeks
27 permission to travel to South Carolina to be with her father and her family.

1 2. Ms. Peterson was placed on Pretrial Supervision on June 3, 2019. One of the
2 conditions of her pretrial release was that Ms. Peterson's travel was restricted to the Central District
3 of California (where Ms. Peterson resides) and the District of Nevada, for Court.

4 3. The parties respectfully request that this Court amend Ms. Peterson's travel
5 restriction to allow her to travel to South Carolina for family-related purposes.

6 4. Ms. Peterson must provide Pretrial Services, before leaving the Central District of
7 California, with her travel itinerary to and from South Carolina.

8 5. Ms. Peterson must provide Pretrial Services with the South Carolina address and
9 phone number of where she will be staying.

10 6. Ms. Peterson has been in full compliance with her other terms of supervision.

11 7. The Pretrial Service Officer does not oppose the modification of Ms. Peterson's
12 travel restrictions to allow her to travel to South Carolina for family-related purposes.

13 8. The United States Attorney does not oppose modifying Ms. Peterson's travel
14 restrictions to allow her to travel to South Carolina for family-related purposes.
15

16 DATED this 19th of June, 2019.

17
18 RENE L. VALLADARES
19 Federal Public Defender

20 /s/ Monique Kirtley

21 By _____

22 MONIQUE KIRTLEY
23 Assistant Federal Public Defender

24 NICHOLAS A. TRUTANICH
25 United States Attorney

26 /s/ Kimberly M. Frayn

27 By _____

 KIMBERLY M. FRAYN
 Assistant United States Attorney

IT IS SO ORDERED.

DATED this 20 day of June, 2019.


UNITED STATES MAGISTRATE JUDGE